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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

COYNESS L. ENNIX JR., M.D.,

Plaintiff,

v.

ALTA BATES SUMMIT MEDICAL
CENTER,

Defendant.

Case No.: C 07-2486 WHA

**PLAINTIFF'S PROPOSED JURY
QUESTIONNAIRE**

Trial Date: June 2, 2008
Dept: Ctrm. 9, 19TH Floor
Judge: Hon. William H. Alsup

Plaintiff Coyness Ennix, M.D. proposes that the Court ask prospective jurors to fill out the following questionnaire prior to voir dire. Defendant ABSMC does not object to this questionnaire except that it does object to the use of the word "gender" in proposed questions G-M.

1 **I. THIS CASE INVOLVES ISSUES RELATING TO CARDIAC SURGERY AND**
2 **DISCRIMINATION. PLEASE ANSWER THE FOLLOWING QUESTIONS TO**
3 **ASSIST THE COURT AND THE PARTIES TO THIS CASE.**

4 A. Have you ever had cardiac surgery or other serious surgery?

5 Yes ____ No ____

6 B. If yes:

7 1. What type? _____

8 2. When? _____

9 3. How would you describe your experience?

10 _____
11 _____
12 _____
13 _____
14 _____

15
16 C. Has anyone in your family ever had cardiac surgery or other serious surgery?

17 Yes ____ No ____

18 D. If yes:

19 1. What type? _____

20 2. When? _____

21 3. How would you describe your experience?

22 _____
23 _____
24 _____
25 _____
26 _____

1 E. Have any of your friends ever had cardiac surgery or other serious surgery?

2 Yes ____ No ____

3 F. If yes:

4 1. What type? _____

5 2. When? _____

6 3. How would you describe your experience?

7 _____
8 _____
9 _____
10 _____
11 _____

12
13 G. Have you or anyone close to you ever been the victim of discrimination based on
14 your race or gender?

15 H. If yes:

16 1. When? _____

17 2. What were the circumstances?

18 _____
19 _____
20 _____
21 _____
22 _____

23
24 I. Have you or anyone close to you ever been accused of discriminating against
25 someone based on their race or gender?

J. If yes:

1. When? _____

2. What were the circumstances?

K. Have you ever observed what you believed to be discrimination against someone based on their race or gender?

L. If yes:

1. When? _____

2. What were the circumstances?

M. Do you any trouble believing that in this decade and in the Bay Area, discrimination based on race or gender might still go on?

N. If yes, why?

1 Dated: May 12, 2008

Respectfully Submitted,

2 MOSCONE, EMBLIDGE & QUADRA, LLP

3
4 By: /s/

G. Scott Emblidge

5 Rachel J. Sater

6 Andrew E. Sweet

7 Attorneys for Plaintiff